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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CASE NO. 2:25-CR-00026-TLN
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED] ORDER
v.)	MODIFYING CONDITIONS OF RELEASE
)	
VERONICA BROOKS,)	
)	
)	
Defendant.)	
)	
)	
)	

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, Danica Mazenko, hereby stipulate as follows:

1. The Complaint in this case was filed on January 24, 2025, and defendant first appeared before a judicial officer of the Court in which the charges in this case were pending on January 28, 2025.

2. On February 3, 2024, the Court held a detention hearing and ordered the defendant released pending trial under the supervision of Pretrial Services. The conditions of release outlined provided that Ms. Brooks would participate in WellSpace residential treatment program upon the availability of an open bed. Ms. Brooks is presently participating in the WellSpace in patient program.

3. On February 11, 2025, Pretrial Services notified the undersigned that a codefendant herein had previously entered Wellspace, and was an active participant at the same WellSpace location as Ms. Brooks.

1 4. On February 11, 2025, Pretrial services contacted Westcare in Fresno, California, and
2 placed a hold on a bedspace there for Ms. Brooks to enter their program on Thursday, February 13,
3 2025.

4 5. A member of the defense team, Steve Craig Anderson, is prepared to provide
5 transportation for Ms. Brooks to be moved from WellSpace in Sacramento, California to Westcare in
6 Fresno, California, on Thursday, February 13, 2025.

7 6. By this stipulation, the parties jointly move for an order modifying conditions 5, 15, 17,
8 and 19 of Ms. Brooks's release to reflect "Westcare" in place of "WellSpace." The amended conditions
9 would accordingly read as follows:

10 a) 5. *Upon release from custody and successful completion of Westcare, you must*
11 *reside with your mother, Rosie Brooks, unless otherwise approved in advance by Pretrial*
12 *Services;*

13 b) 16. *You must participate in the substance abuse treatment program at*
14 *Westcare inpatient facility, and comply with all the rules and regulations of the program. You*
15 *must remain at the inpatient facility until released by the pretrial services officer;*

16 c) 18. *Upon successful completion of Westcare, you must reside with your mother,*
17 *Rosie Brooks, unless otherwise approved in advance by Pretrial Services; and,*

18 d) 19. *Upon successful completion of Westcare, you must participate in a cognitive*
19 *behavioral therapy program as directed by the pretrial services officer. Such programs may*
20 *include group sessions led by a counselor or participation in a program administered by the*
21 *Pretrial Services office;*

22 7. Conditions 20 and 21 are no longer applicable.

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1 8. All other conditions of release are to remain unchanged.
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4 IT IS SO STIPULATED.
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6 Dated: February 12, 2025

MICHELE BECKWITH
Acting United States Attorney

7
8 /s/ Emily Sauvageau
9 EMILY SAUVAGEAU
Assistant United States Attorney

10 Dated: February 12, 2025

11 /s/ Danica Mazenko
12 DANICA MAZENKO
13 Counsel for Defendant
14 Veronica Brooks

15 IT IS SO ORDERED.
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17 Dated: February 12, 2025

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HON. SEAN C. RIORDAN
UNITED STATES MAGISTRATE JUDGE